

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

)
IDQ OPERATING, INC.,)
Plaintiff,)
)
v.)
AEROSPACE COMMUNICATIONS)
HOLDINGS CO., LTD.,)
Defendant.)
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CIVIL ACTION NO. 6:15-CV-781-JRG-KNM
JURY TRIAL DEMANDED

**NOTICE OF SPECIAL APPEARANCE FOR DEFENDANT
AEROSPACE COMMUNICATIONS HOLDINGS CO., LTD.**

Please take notice that the following individual hereby enters a special appearance as counsel of record for Aerospace Communications Holdings Co., Ltd. ("ACH"):

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This is a limited appearance only, and it does not allow IDQ to serve counsel for ACH, which would allow IDQ to benefit from the ineffective attempts at service and continued refusal to follow proper procedures for proper service of a foreign company under the Hague Convention.

Dated: November 19, 2015

Respectfully submitted,

/s/ Lionel M. Lavenue

Lionel M. Lavenue

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**Counsel for Defendant Aerospace
Communications Holdings Co., Ltd. (for
the limited purposes of filing a Motion to
Quash Service, an extension of time to
respond to the Complaint, and a Motion
to Dismiss, among other case
requirements)**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document, **NOTICE OF SPECIAL APPEARANCE FOR DEFENDANT AEROSPACE COMMUNICATIONS HOLDINGS CO., LTD.**, was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule-CV-5(d), all other counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email on the 19th day of November, 2015.

/s/ Lionel M. Lavenue
Lionel M. Lavenue